

October 25, 2005

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VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: **EX PARTE PRESENTATION**, Telecommunications Relay Services
and Speech-to-Speech Services for Individuals with Hearing and Speech
Disabilities, CG Docket No. 03-123

Dear Ms. Dortch:

On October 24, 2005, John Nelson, Dixie Ziegler, and Anne Girard of Hamilton Relay, Inc. ("Hamilton"), and the undersigned counsel on behalf of Hamilton, met with Chairman Kevin Martin, his Legal Advisor Michelle Carey, and Monica Desai, Chief of the Consumer & Governmental Affairs Bureau. Hamilton provided an overview of its relief work and outreach efforts as the state-certified Telecommunications Relay Service provider in Louisiana, in response to Hurricanes Katrina and Rita.

In addition, Hamilton advocated the adoption of rules: 1) prohibiting the blocking of Video Relay Services ("VRS") calls; 2) strengthening the Commission's enforcement of relay service rule violations; and 3) mandating federal certification of Internet Relay and VRS providers as a further enforcement mechanism. Hamilton also urged Commission review of the decision to adopt a "rate of return on investment" methodology for relay services. Hamilton requested that the Commission solicit public comment on Hamilton's proposed "MARS Plan" as a superior rate-making methodology, because it is grounded in competition and does not require the evaluation of individual providers' costs.¹

This filing is made in accordance with Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2). In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

HOLLAND & KNIGHT LLP

/s/ David A. O'Connor

David A. O'Connor

Counsel for Hamilton Relay, Inc.

¹ See Hamilton Petition for Reconsideration, CG Docket No. 03-123 (filed Oct. 1, 2004).